

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE 0:23-cv-61223-RKA

TARA RULE, individually and)
on behalf of others similarly situated,)
))
 Plaintiff,))
))
vs.)) Case 0:23-cv-61223-RKA
))
HEALTHCARE REVENUE RECOVERY))
GROUP, LLC))
))
 Defendant.))

**UNOPPOSED SECOND MOTION FOR EXTENSION OF TIME FOR
DEFENDANT HEALTHCARE REVENUE RECOVERY GROUP, LLC
TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Healthcare Revenue Recovery Group, LLC (“Defendant” or HRRG), by and through its undersigned counsel and pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 7.1, hereby files this Unopposed Motion for an Extension of Time to answer or otherwise respond to the Complaint (the “Complaint”) filed by Plaintiff to September 21, 2023. In support of this motion, Plaintiff states as follows:

1. Plaintiff filed the Complaint with this Court on June 27, 2023. (Doc. 1).
2. HRRG was served with the Complaint on July 3, 2023.
3. On July 24, 2023, HRRG filed a first Unopposed Motion for an Extension of Time to answer or otherwise respond to the Complaint (“First Motion”). (Doc. 4).
4. On July 24, 2023, this Court granted the First Motion setting September 7, 2023 as HRRG’s deadline to answer or otherwise respond to the Complaint. (Doc. 5).

5. HRRG respectfully requests that this Court grant its request to extend the deadline to answer or otherwise respond to Plaintiff's Complaint to September 21, 2023.

6. This request is not made for the purpose of delay or harassment, and no party will be prejudiced by the additional time for HRRG to answer or otherwise respond.

7. The parties are and continue to be engaged in communications regarding the allegations in the Complaint, are conducting an investigation into the underlying facts, in order for the parties' good faith settlement negotiations to continue, or failing that to allow HRRG time to respond.

8. In an email on September 1, 2023, HRRG requested and Plaintiff's counsel agreed that HRRG may have up to and including September 21, 2023, to file its answer or otherwise respond to Plaintiff's Complaint.

Respectfully submitted this 7th day of September, 2023.

Respectfully submitted,

KAUFMAN DOLOWICH & VOLUCK LLP

/s/Avery Dial

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Rule 7.1(a)(3) CERTIFICATION

Pursuant to Local Rule 7.1(a)(3), Defendant's counsel conferred with Plaintiff's counsel regarding the extension of time for it to answer or otherwise respond to the Complaint. Plaintiff's counsel consented to the requested extension of time.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of September, 2023, a true and correct copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system which will send notice of electronic filing to all parties or in some other authorized manner for those counsel or parties who are not authorized to receive notices electronically.

Respectfully submitted,

By: /s/Avery Dial
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